

EXHIBIT J

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1 discussing here, the negotiation of --

2 **A The late summer of 2002.**

3 Q Did you have an engagement letter with
4 her.

5 **A I did not.**

6 Q What was the scope of your representation?

7 **A I'm sorry, I can't hear you.**

8 Q What was the scope of your representation?

9 **A The representation was to try to resolve**
10 **the family dispute over the 2001 GRAT.**

11 Q And you also represented Frances Middleton
12 at the same time in that same dispute?

13 **A I did.**

14 Q And you previously represented John
15 Middleton in other trust and estates matters?

16 **A I did.**

17 Q Frances Middleton permitted you to
18 disclose Nupson-15, which is GRAT 1?

19 **A She asked me to disclose it.**

20 Q Asked you to disclose it.

21 Did she ask you to disclose any other
22 details about her trust and estates planning?

23 **A She did not.**

24 Q Okay. Did you explain to Anna that you
25 were not permitted to discuss any of those matters

1 with Anna?

2 **A I didn't explain that, no.**

3 Q Nupson-15 was that ever transmitted -- I
4 know we talked about Anna Nupson.

5 But do you know if it was transmitted
6 formally to Frances Middleton?

7 **A I'm just -- actually just trying to recall**
8 **whether she wanted copies of her documents. If she**
9 **wanted them, she would have had it. Usually copies**
10 **of -- certainly in Herb's time, all of the family**
11 **documents were kept by Herb in binders at the**
12 **company.**

13 **And I just don't recall if Fran had**
14 **her own binders at home. If she did, I would have**
15 **-- when I brought it, I would have given her this**
16 **copy and put it in her binder. But I don't have a**
17 **specific recollection of that. Are we done with**
18 **this one?**

19 Q We are.

20 **A Things are piling up.**

21 Q No, I appreciate it. You know what,
22 before I go to Exhibit 52, I said you're done with
23 that one -- let me -- let me -- do we know what the
24 notes are, what exhibit notes are Anna's notes?

25 (Discussion was held off the record.)